## **Accountability Controls**

- 1. Minute Menu Claim System: Minute Menu System software is a product of Minute Menu, Inc., Richardson, Texas. The Sponsor must maintain all required data for current and previously participating Providers and enrolled children in the CACFP in the Minute Menu system. This data is the basis for the total number of homes reported, number of children served and claims for reimbursement submitted. All data contained in Minute Menu for the Sponsors and its providers must be available to the state agency or other USDA-FNS authorities upon request during the Sponsor's normal hours of business operation.
- 2. Regulations and Guidance: The Sponsor has file copy or internet access to CACFP federal regulations, policies, questions and answers, guidance and procedures in addition to state agency CACFP Administrative Rules, policies, and guidance. These documents are provided to Providers upon request and as needed.
- 3. Policies and Procedures: The written policies and procedures forming part of the Sponsor's Management Plan are included in this document. The Sponsor is required to submit a copy of any changes to its Sponsor Management Plan within 30 days of occurrence. The Sponsor Management Plan Annual Submissions Log lists the current, relevant and required documents which support the Management Plan and the effective date of each.
- 4. Organizational Records: The Sponsor retains records for all administrative, financial, and operational aspects of the organization. The specific records as stated below are retained as applicable to this Sponsor and are available in accordance with 7 CFR 226.10(d):
  - personnel policies;
  - the organization's bylaws, mission statement, and organizational chart;
  - salary and benefits for CACFP staff that includes, but is not limited to, payments to the Social Security Administration, the Internal Revenue Service, life insurance, health insurance, and benefit and retirement programs which may be self funded or simplified plans;
  - facility rental/lease agreement and payments, or if it is an owned facility, a depreciation schedule;
  - procurement and expenditure records and documentation including, but not limited to, telephone charges, training and office supplies, and commercial printing;
  - copies of all service and lease contracts including, but not limited to, janitorial and/or maintenance services, equipment leases, rentals;
  - copies of purchase orders;
  - all training agendas, including the Sponsor's procedures and policies for assuring compliance with the Health Insurance Portability and Accountability Act (HIPAA) and for maintaining the confidentiality of information such as Provider tier status and Protected Health Information;
  - policies and procedures for in-state and out-of-state travel costs that includes, but is not limited to, who travels, under what circumstances, what per diem rates may be claimed, when per diem and lodging may be claimed, what

- documentation is required for monitoring reviews and mileage reimbursement:
- policies and procedures for automobile lease and/or purchase agreement/s and/or Sponsor-owned vehicles, that includes, but is not limited to, the use of the vehicle, who may use it, under what circumstances, whether the vehicle can be used for both personal and business purposes, insurance coverage, and the method of documenting use, such as a mileage log;
- general liability and workers' compensation policies;
- records of travel planned and records of travel completed and approved by supervisor including destinations and mileage records for each employee when paying travel expenses for CACFP activities;
- total advertising and public information costs, including purpose and content;
- costs/dues for subscriptions and memberships, including descriptions of the content and purchase of each.
- bank charges;
- copies of bond agreement(s), including name(s) of employees(s) covered and extent of coverage;
- historical records of the number of sponsored facilities;
- all other operational and financial records documenting received and expended CACFP funds; and
- policies and procedures that include but are not limited to, tracking, compiling and reporting administrative costs and reimbursement and the method for designating expenses to specific budget line items and/or programs.
- 5. As listed on the Management Plan Update Log, the Sponsor's:
  - a. Bylaws are Attachment A.
  - b. HIPAA policy is Attachment B.
  - c. 'Building for the Future' Parent Notification is required, and it is Attachment C.
  - d. Mission Statement is Attachment D.
  - e. Organizational Chart is Attachment E.
- 6. As listed on the Annual Submissions Log, the Sponsor's:
  - a. There are three (3) civil rights documents labeled Attachment F:
    Civil Rights Compliance and Enforcement in the CACFP,
    CACFP Application for Participation Civil Rights Compliance, and
    Racial Ethnic Data for Montana.
  - b. Instructions and Record of Civil Rights Compliance Training is Attachment G.
  - c. General Liability Insurance Certificate is Attachment H.
  - d. List of Providers qualifying for Tier I by receiving the Supplemental Nutrition Assistance Program (SNAP) [including 6-digit case number] is Attachment I.
  - e. Verification that all providers have met their FY15 CACFP Annual Training requirements is Attachment J.
  - f. Workers' Compensation Insurance Certificate is Attachment K.